



FEMA

Transit Security Grant Program (TSGP)

Environmental Planning and Historic Preservation (EHP) Fact Sheet

All grant-funded projects must have a completed EHP review prior to initiating work.

FEMA's Grant Programs Directorate (GPD) has developed this fact sheet to assist TSGP grant recipients with their environmental and historic preservation (EHP) submissions. EHP compliance is a condition of the acceptance and use of all Federal grant funds. TSGP projects cannot be initiated until an EHP approval has been issued by FEMA.

The EHP review process has been streamlined for timely and thorough reviews for all grant programs. However, GPD has identified common issues in EHP submissions by TSGP grantees, which have caused them significant – and unnecessary – delays. These issues are listed below to further assist TSGP recipients with their EHP review packets, and to avoid delays in the review process.

The most common delays found in reviewing EHP materials from TSGP grantees are the result of a failure to:

- Provide a complete project description that states what work is proposed and how the work would be done;
- Provide a physical project location in the form of a street address (preferred) or latitude/longitude;
- Submit a project site aerial map;
- Submit clear ground-level color photos showing project boundaries and specific installation or construction sites; and
- Provide the ages of any buildings or structures on which or near which work will be proposed;
- Adequately describe the extent of ground disturbance.

Although this information is requested in the GPD EHP Screening Form, to avoid delays in their EHP review grantees are encouraged to pay particular attention to these details. The following provides helpful information on how to provide these items in preparation for an EHP review.

Common Submission Requirements for EHP Review of TSGP Projects

TSGP grants often fund projects that include physical security enhancements for owners and operators of transit systems to protect critical infrastructure through structural hardening, and installation of fencing, bollards, cameras and guard stations. These projects may impact historic buildings or structures and frequently involve ground disturbance. All projects involving these types of activities need to undergo an EHP review before work is started.

Information Needed	Reason and Best Practices
EHP Screening Form	A well completed EHP Screening form provides project information on “who, what, where, when, why, and how” the proposed project is being implemented. The EHP Screening Form is available at: http://tiny.cc/4827d . Filling out this form completely and including all supporting documentation such as maps, photos, and site drawings, will enable a timely EHP review.
Visual documentation (aerial and ground-level color photographs showing installation locations)	Aerial and ground-level color photographs provide context and clarity for EHP reviewers. Photographs also allow reviewers to assess the environmental and historic resources on-site and in the area surrounding the proposed project. The “Guide for Preparing Project Photographs for EHP Review” describes in detail how to take suitable photographs.
Age of Building/Date of Original Construction	The age of a structure is necessary to determine any potential impacts to historic resources. Certain buildings or structures that are 50 years old or older may either be listed or eligible for listing on the National Register of Historic Places. Please provide the date the building was originally constructed as well as the dates of any major renovations or additions.
Extent of Ground Disturbance (e.g., for installation of fencing, bollards, lighting, or utility tie-ins)	Ground disturbance has the potential to disturb archaeological resources. Hence, a description of the length, depth, and width of soil disturbance is of particular interest to EHP reviewers in order to assess project effects to soils. The “Guide for Describing Ground Disturbance for EHP Review” describes in detail the type of information that should be provided to describe ground disturbance.

Online training from FEMA’s Emergency Management Institute (EMI) is available to better understand the National Environmental Policy Act of 1969 (NEPA) and other EHP laws and Executive Orders. *Coordinating Environmental and Historic Preservation Compliance*, course #IS-253, is designed to provide grantees with basic background information regarding FEMA’s EHP review process. The course can be found at: <http://training.fema.gov/EMIWEB/IS/is253.asp>.

Be Compliant!

All grant-funded projects must have a completed EHP review prior to initiating work. Projects for which work is initiated prior to EHP approval are considered **non-compliant**. GPD is under no obligation to conduct an EHP review or fund non-compliant projects. Non-compliant projects may be subject to recoupment of funds.

In Conclusion

The EHP review process can assist with efficient project planning and implementation; make projects more cost efficient; improve community relationships; and protect natural and cultural resources. FEMA’s GPD EHP program staff are available to assist TSGP grant recipients with EHP related questions, ensuring all TSGP funded projects are properly reviewed in a timely manner.

For further information, please contact your Program Analyst (PA) or email your inquiry to GPDEHPinfo@dhs.gov.